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Attorney for Defendant
BERNADETTE ESCUE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	No. CR 07-00610 JF
)	
Plaintiff,)	EX PARTE APPLICATION FOR ORDER
)	PERMITTING TRAVEL IN CONNECTION
v.)	WITH DEFENDANT'S NEW
BERNADETTE ESCUE,)	EMPLOYMENT, SUBMITTED WITH THE
)	APPROVAL OF THE AUSA AND PRETRIAL
Defendant.)	SERVICES; DECLARATION OF COUNSEL
)	

Defendant Bernadette Escue, through counsel, applies for permission to travel to and from Seattle, Washington from April 21-25, 2008, in connection with an orientation program offered to new hires for the company with which she recently began working.

This application is submitted after consultation with the AUSA and the supervising Pretrial Services Officer, both of whom have informed counsel that they have no objection to this request.

This Application is based on the attached *Declaration Of Counsel*. A proposed order accompanies this application.

Dated: April 15, 2008

Respectfully submitted,

/S/
Mark R. Vermeulen
Attorney for Defendant
BERNADETTE ESCUE

DECLARATION OF COUNSEL

I, Mark R. Vermeulen, declare:

1. I am an attorney duly admitted to practice before this Court and I represent Defendant Bernadette Escue in this action.

2. I request that Ms. Escue be permitted to travel to and from Seattle, Washington from April 21-25, 2008. She recently was hired by a new employer and she needs to attend an orientation program offered to new hires by her new employer during those dates.

3. I have spoken with Pretrial Services Officer Tim Elder, who is assigned to this case, and with Susan Knight, who is standing in for AUSA Joe Fazioli (the AUSA handling this case), as Mr. Fazioli is currently not available. Both Mr. Elder and Ms. Knight have informed me that they have no objection to this request.

4. I will email a copy of this *Application* and the accompanying *[Proposed] Order Permitting Travel* to Pretrial Services Officer Tim Elder and to AUSA Susan Knight on the same date I file this via ECF, and a copy of each will be provided to AUSA Joe Fazioli automatically via ECF filing.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 15, 2008 at San Francisco, CA.

/S/
Mark R. Vermeulen